

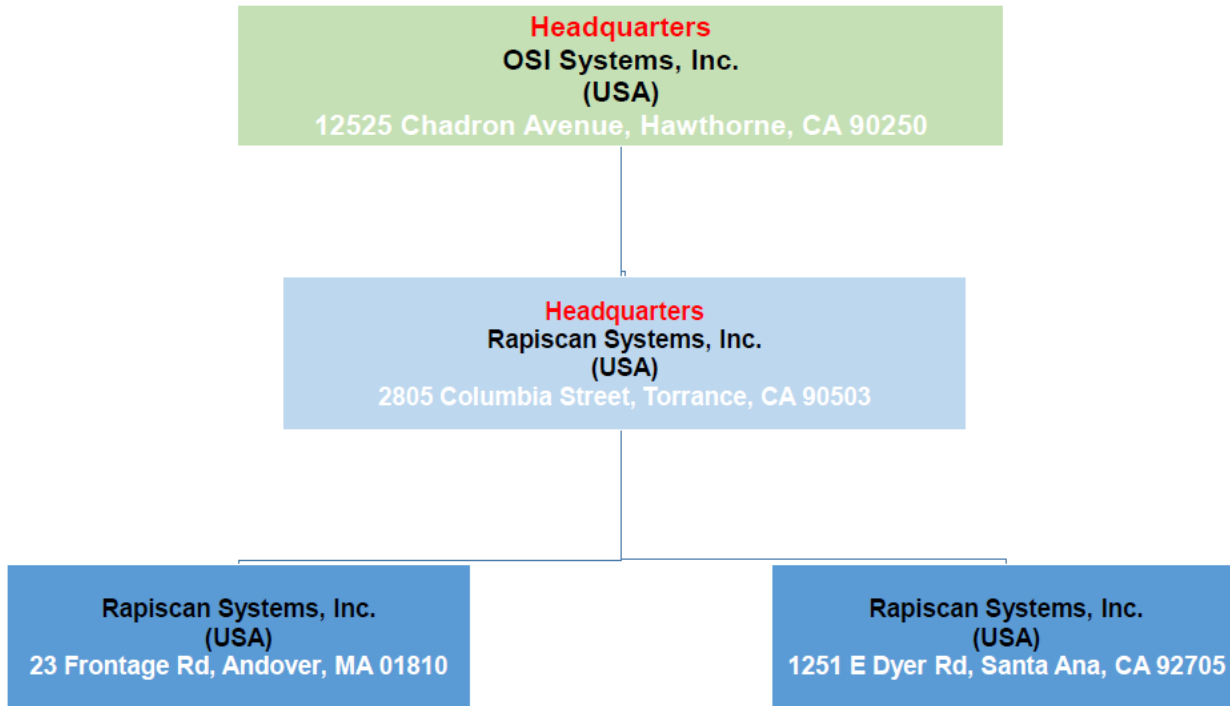
August 14, 2017

To whom it may concern,

This letter is to request a name change for our **Exempt Distribution License 20-23904-01E** (Attachment – Item 1) and **Sealed Source and Device Registration Certificate NR-0399-D-101-E** (Attachment – Item 2) that are currently issued to Morpho Detection, LLC. We would like to withdraw the amendment request dated April 30, 2017 (Attachment – Item 3) and resubmit this new application. The new name “**Rapiscan Systems, Inc.**” was effective on July 7, 2017. The following is a brief description of the corporative change of ownership since April 6, 2017.

- Prior to April 6, 2017, Morpho Detection was part of Safran Identity & Security.
- On April 6, 2017, Smiths Group plc. completed the acquisition of Morpho Detection that was conditional on the post-completion divestment of Morpho Detection’s explosive trace detection business (ETD).
- On July 7, 2017, OSI Systems, Inc. completed the acquisition of the former Morpho Detection’s ETD business from Smiths Group plc. The ETD business was merged with and into the Rapiscan Systems, Inc.
  - **Rapiscan Systems**, an OSI Systems company, is headquartered in Torrance, California.
  - **OSI Systems, Inc.** is a vertically integrated designer and manufacturer of specialized electronic systems and components for critical applications in the homeland security, healthcare, defense and aerospace industries.

The following chart is the company organization chart after the merger on July 7, 2017.



Post-merger, the former Morpho Detection's ETD business was fully integrated into Rapiscan Systems, Inc. The legal documentation of the merger is attached (Attachment – Item 4).

For our **Exempt Distribution License 20-23904-01E** (Attachment – Item 1), we would like to make changes to the license condition 12.A:

12. A. The licensee may distribute only from its facilities located at ~~7151 Gateway Boulevard, Newark, California;~~ and 23 Frontage Road, Andover, Massachusetts.

- Please remove the Newark, CA facility from license condition 12.A. The Newark facility is now part of Smiths Detection. The Andover facility is now part of Rapiscan Systems. The device models listed on our **Exempt Distribution License 20-23904-01E** (Attachment – Item 1) and **Sealed Source and Device Registration Certificate NR-0399-D-101-E** (Attachment – Item 2) are being manufactured at Rapiscan Systems, Inc., located at 23 Frontage Road, Andover, Massachusetts.

No change was made to the products since the last amendment to NR-0399-D-101-E on June 11, 2015.

No change was made to the previous commitments made by the former Morpho Detection, LLC.



Thank you for your attention to this matter. If you have any questions or require additional information, please contact me at (978) 933-4363.

Sincerely,

A handwritten signature in black ink, appearing to read "Zemei Liu". The signature is fluid and cursive, with a long horizontal stroke at the end.

Zemei Liu, Ph.D., DABR  
Global Radiation Program Manager, ETD business  
Rapiscan Systems

Enclosures

August 16, 2017

To whom it may concern,

In addition to the name change requests (August 14, 2017) for our **Exempt Distribution License 20-23904-01E** (Attachment – Item 1) and **Sealed Source and Device Registration Certificate NR-0399-D-101-E** (Attachment – Item 2), we are submitting additional requests for the following 2 changes:

- For our **Exempt Distribution License 20-23904-01E** (Attachment – Item 1), we would like to make changes to the license condition 12.A:
  - 12. A. The licensee may distribute only from its facilities located at ~~7151 Gateway Boulevard, Newark, California;~~ and 23 Frontage Road, Andover, Massachusetts; and 2805 Columbia Street, Torrance, California.
    - (requested on August 14, 2017)  
Please remove the Newark, CA facility from license condition 12.A. The Newark facility is now part of Smiths Detection. The Andover facility is now part of Rapiscan Systems. The device models listed on our **Exempt Distribution License 20-23904-01E** (Attachment – Item 1) and **Sealed Source and Device Registration Certificate NR-0399-D-101-E** (Attachment – Item 2) are being manufactured at Rapiscan Systems, Inc., located at 23 Frontage Road, Andover, Massachusetts.
    - Please add our Rapiscan Systems, Inc. headquarters' address – 2805 Columbia Street, Torrance, California to license condition 12.A.
- Combine our **Exempt Distribution License 20-23904-01E** (Attachment – Item 1) with our company headquarters' **Exempt Distribution License 04-24011-01E** (Attachment – Item 5).

No change was made to the products since the last amendment to NR-0399-D-101-E on June 11, 2015.



Thank you for your attention to this matter. If you have any questions or require additional information, please contact me at (978) 933-4363.

Sincerely,

A handwritten signature in black ink, appearing to read "Zemei Liu". The signature is fluid and cursive, with a long horizontal stroke at the end.

Zemei Liu, Ph.D., DABR  
Global Radiation Program Manager, ETD business  
Rapiscan Systems

Enclosures